

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

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TERRA PARTNERS; TERRA XXI, LTD.; §
ROBERT WAYNE VEIGEL; §
ELLA MARIE WILLIAMS VEIGEL; §
VEIGEL FARMS, INC.; §
VEIGEL CATTLE COMPANY; and §
VEIGEL FARM PARTNERS, §

Plaintiffs, §

v. §

AG ACCEPTANCE CORPORATION, §

Defendant. §

No. 2:15-cv-236-J
Judge Robinson

**ROBERT WAYNE AND ELLA MARIE VEIGEL'S MOTION FOR IN CAMERA
REVIEW OF PROTECTED ATTORNEY-CLIENT DOCUMENTS**

TO THE HONORABLE JUDGE:

COME NOW, Plaintiffs Robert Wayne and Ella Marie Veigel, on a limited *pro se* basis, and would show the Court as follows:

Plaintiffs' counsel of record, Keleher & McLeod, P.A. (Jeffery Dahl and Justin Breen) and the Law Office of Philip Roland Russ (Philip Russ) (together "Plaintiffs' Attorneys") have filed a Motion to Withdraw As Counsel (Dkt. #53) citing unspecified "irreconcilable differences" to such an extent that the Plaintiffs' Attorneys can no longer serve as Plaintiffs' counsel.

Plaintiffs Robert Wayne and Ella Marie Veigel (together "Movants") oppose the Motion to Withdraw and have made a *pro se* request of the Court to consent and allow Movants to file a response to the Motion to Withdraw as Movants (and other Plaintiffs) have been unable to retain new counsel as ordered by the Court (Dkt. #58).

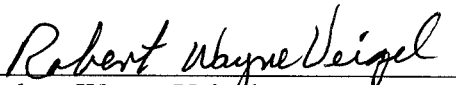
It opposition to the Motion to Withdraw, it is necessary for Movants to produce confidential, protected, and privileged attorney – client information to show that although the Plaintiffs have had differences with Plaintiffs’ Attorneys, Plaintiffs have always deferred to Plaintiffs’ Attorneys’ professional advise. As such, there are no “irreconcilable differences” between Plaintiffs and Plaintiffs’ Attorneys or any other valid justification for Plaintiffs’ Attorneys to be allowed to abandon their clients particularly at this late stage of the litigation and Plaintiffs’ significant investment of time, effort, and scarce financial resources.

Therefore, Movants request that the Court conduct an *in camera* review of the documents provided by the Appendix to this Motion in support of Movants’ opposition to the Motion to Withdraw in such a manner that honors and protects Movants’ privileged attorney – client information to ensure that such privilege cannot be deemed waived by the Defendant.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Movants pray that the Court grant this Motion, and for such and further relief that may be awarded at law or in equity.

Respectfully submitted,


Robert Wayne Veigel, *pro se*
105 Quince St.
Hereford, Texas 79045
e-mail: RWVeig@aol.com
mobile: (806) 231-1008


Ella Marie Veigel, *pro se*
105 Quince St.
Hereford, Texas 79045
e-mail: EMVeig@aol.com
mobile: (806) 335-0307

CERTIFICATE OF SERVICE

THIS HEREBY CERTIFIES that on March 23, 2016, a copy of this Motion without the Appendix was e-mailed to the following:

Lead Counsel for Plaintiffs:

Justin Breen and Jeff Dahl
Keleher & McLeod, P.A.
Post Office Box AA
Albuquerque, New Mexico
Telephone: (505) 346-4646
Facsimile: (505) 346-1370
E-Mail: JBB@Keleher-Law.com
E-Mail: JAD@Keleher-Law.com

Local Counsel for Plaintiffs:

Philip Roland Russ
Law Offices of Philip R. Russ
2700 S. Western St., Suite 1200
Amarillo, Texas 79109
Telephone: (806) 358-9293
Facsimile: (806) 358-9296
E-Mail: PhilipRRuss@RussLawFirm.com

Lead Counsel for Ag Acceptance Corporation:

Barbara Whiten Balliette
Reid Collins & Tsai LLP
1301 S. Capital of Texas Hwy., C-300
Austin, Texas 78746
Telephone: (512) 647-6100
Facsimile: (512) 647-6129
E-Mail: BBalliette@RCTLegal.com

Local Counsel for Ag Acceptance Corporation:

Thomas C. Riney
Riney & Mayfield LLP
320 South Polk Street, Suite 600
Maxor Building
Amarillo, Texas 79101
Telephone: (806) 468-3200
Facsimile: (806) 376-4509
E-Mail: TRiney@RineyMayfield.com

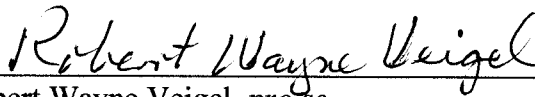
Lead Counsel for Ag Acceptance Corporation [District of New Mexico]:

Richard F. Rowley II
Rowley Law Firm, L.L.C.
P.O. Box 790
Clovis, New Mexico 88102-0790

Telephone: (575) 763-4457

Facsimile: (575) 763-4450

E-Mail: R2@RowleyLawFirm.com

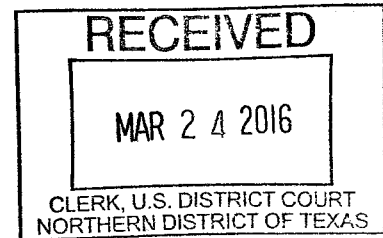

Robert Wayne Veigel, *pro se*

Robert Wayne and Ella Marie Veigel

105 Quince St.
Hereford, Texas 79045

March 23, 2016

The Clerk for the
United States District Court
Northern District of Texas
205 E. Fifth Street, Unit 13240
Amarillo, Texas 79101

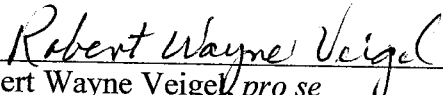


Re: Cause No. 2:15-cv-236-J; Terra Partners, et al. v. AG Acceptance Corporation In
the United States District Court, Northern District of Texas, Amarillo Division

Dear Clerk:

Pursuant to the Court's order of March 18, 2016 (Dkt. #62) please file the
enclosed Robert Wayne and Ella Marie Veigel's Response to Motion to Withdraw.

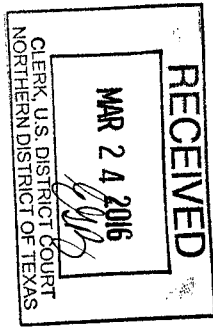
Pursuant to the Court's order of March 21, 2016 (Dkt. #64) please file the
enclosed Robert Wayne and Ella Marie Veigel's Motion For *In Camera* Review Of
Protected Attorney-Client Documents. I have previously submitted the proposed
Appendix to this motion containing privileged/protected attorney-client documents to
Judge Robinson by a letter dated February 29, 2016. If I correctly understand the Court's
order, I am not submitting the Appendix for public filing unless further expressly ordered
so as to not waive the attorney-client privilege.


Robert Wayne Veigel, *pro se*
e-mail: RWVeig@aol.com
cell: (806) 231-1008

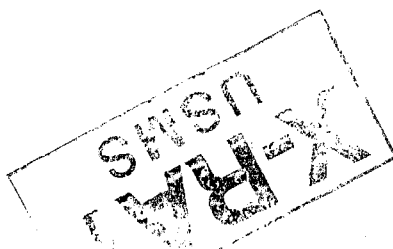
Enclosures::

Robert Wayne and Ella Marie Veigel's Response to Motion to Withdraw
Robert Wayne and Ella Marie Veigel's Motion for In Camera Review

Bob Weigel
105 Quince
Herford TX 79045



The Clerk for the
United States District Court
Northern District Texas
205 E. Fifth Street, Unit 13240
Omaha, Texas 79101



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